

**IN UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

HARRY L. SAMUEL,

Plaintiff,

v.

THOMAS CARROLL, ET. AL

Defendants,

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C.A. No. 05-037- SLR

JURY OF 12 DEMANDED

**ANSWER OF DEFENDANT FIRST CORRECTIONAL MEDICAL
TO PLAINTIFF'S DISCOVERY**

1. Defendant FCM does not possess any policies, directives, customs, procedures or instructions to staff regarding the use of handcuff restraint.

2. See produced documents.

3. Objection. This interrogatory is directed to former defendants. Defendant FCM has no information regarding this request.

4. See produced documents.

5. See produced medical records.

6. See produced medical records.

7. Defendant FCM has no knowledge regarding staff members and hand cuff restraints.

8. Defendant FCM cannot comment upon the security measures taken by the Department of Correction.

9. Defendant FCM does not have access to grievance information. These documents are in the possession of the Department of Correction.

10. To the extent these documents are in the possession of defendant First Correctional Medical, see produced medical records.

11. To the extent this information is in the possession of defendant First Correctional Medical, see produced medical records.

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

Dana Spring Monzo

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorney for Defendant First Correctional Medical

Dated: December 14, 2006

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

HARRY L. SAMUEL,)	
)	C.A. No. 05-037- SLR
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)	JURY OF 12 DEMANDED
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v.)	
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THOMAS CARROLL, ET. AL)	
)	
Defendants,)	

CERTIFICATE OF SERVICE

I, DANA SPRING MONZO, hereby certify that this date attached *Answer of Defendant First Correctional Medical to Plaintiff's Discovery* was served to the following:

Via Electronic Service

Kevin J. Connors
1220 N. Market Street, Suite 500
P.O. Box 8888
Wilmington, DE 19899

Ophelia M. Waters
820 N. French Street, 8th Floor
Wilmington, DE 19801

Via U.S. Mail

Harry L. Samuel
SBI# 201360
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

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JURY OF 12 DEMANDED

**DEFENDANT FIRST CORRECTIONAL MEDICAL'S
PRODUCED DOCUMENTS AND MEDICAL RECORDS**

**CONFIDENTIAL - FILED UNDER SEAL
SUBJECT TO A PROTECTIVE ORDER**

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar #2689
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Dated: December 14, 2006